

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

IN RE: ) CHAPTER 7  
 ) CASE NO. 23-00484  
BDC Group, Inc. )  
 ) Adversary Case No. 25-09041  
 )  
 ) NOTICE OF AND MOTION FOR  
 ) COMPROMISE OR SETTLEMENT  
Debtor(s). ) OF CONTROVERSY WITH  
 ) VW CREDIT, INC. (ONLY).

The undersigned Trustee has entered into a compromise or settlement of controversy and moves the court to approve the following:

The case trustee has brought an Adversary Proceeding, Case No. 25-09041, to recover payments made by the Debtor to VW Credit, Inc. d/b/a Audi Financial Services ("VCI") totaling \$32,028.36. After discussions, and evaluation of the asserted defense(s), the parties have agreed to settle the legal dispute for \$15,000.00, to be paid upon entry of a Court Order approving this settlement. The Trustee will dismiss, with prejudice, VCI from this Adversary Proceeding. Additionally, the Trustee releases VCI and its affiliated individuals and entities from any and all claims relating to the Debtor's bankruptcy case, including but not limited to the allegations in this Adversary Proceeding and related Complaint.

In light of the uncertainty of litigation, the legal issues involved, and the additional time and expenses involved in prosecuting the Adversary Proceeding as against VCI, the Trustee submits that this recovery as proposed herein is fair and reasonable.

NOTICE IS HEREBY GIVEN that objections must be served on the undersigned trustee, the United States Trustee, 111 7<sup>th</sup> Avenue SE Box 17, Cedar Rapids, Iowa 52401, debtor(s), debtor(s) counsel and filed with the Clerk of Bankruptcy Court at 111 7<sup>th</sup> Avenue SE Box 15, Cedar Rapids, Iowa 52401 on or before 4:30 p.m., September 15, 2025.

NOTICE IS FURTHER GIVEN that timely filed objections will be set for hearing by separate notice. If no objections are filed, a separate order will enter.

I hereby certify that on this date a copy of this Notice and Motion was served on the U.S. Trustee, debtor(s), debtor(s) counsel, and all creditors or other parties-in-interest who have filed a request for notice pursuant to Local Bankruptcy Rule 2002-1(b).

DATED: August 25, 2025.

\_\_\_\_\_/s/Renee K. Hanrahan, Trustee\_\_\_\_\_  
Renee K. Hanrahan, Chapter 7 Trustee  
P.O. Box 1088  
Cedar Rapids, IA 52406-1088  
319.533.7358; rhanrahan@sharontc.net

NOTE: Service List/Clerk's Mailing Matrix attached